

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
CITGO Refinery - Corpus Christi, TX - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VI

**Subject:** POLREP #1  
Initial PolRep  
CITGO Refinery - Corpus Christi, TX  
A6R9  
Corpus Christi, TX  
Latitude: 27.8066230 Longitude: -97.4194480

**To:**  
**From:** Jhana Enders, OSC  
**Date:** 3/13/2012  
**Reporting Period:**

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	<b>Contract Number:</b>
<b>D.O. Number:</b>	<b>Action Memo Date:</b>
<b>Response Authority:</b> CERCLA	<b>Response Type:</b>
<b>Response Lead:</b> PRP	<b>Incident Category:</b>
<b>NPL Status:</b> Non NPL	<b>Operable Unit:</b>
<b>Mobilization Date:</b> 3/7/2012	<b>Start Date:</b> 3/7/2012
<b>Demob Date:</b> 3/9/2012	<b>Completion Date:</b>
<b>CERCLIS ID:</b>	<b>RCRIS ID:</b>
<b>ERNS No.:</b>	<b>State Notification:</b>
<b>FPN#:</b>	<b>Reimbursable Account #:</b>

#### 1.1.1 Incident Category

A release of Hydrofluoric Acid (HF) sparked citizen concerns and the deployment of a seven person investigation team from the U.S. Chemical Safety Board (CSB) as a follow-up to a 2009 incident. OSC Enders was dispatched to coordinate with the facility and local/state agencies to verify facts and gather additional information related to the release, response actions and notification procedures.

#### 1.1.2 Site Description

A release of HF and hydrocarbons from an alkylation unit at the CITGO Refinery in Corpus Christi, Texas occurred the evening of 03/05/2012. The release occurred from a flange (unit shut down and being repaired). The alarm system immediately activated the deluge system (water cannon sprays) which were reported to contain the release. The Texas Commission on Environmental Quality (TCEQ), the Corpus Christi Local Emergency Planning Committee (LEPC)/Fire Department were

notified and on-scene. As a precaution, the Fire Department ordered a quarter mile shelter-in-place for the Hillcrest community (due to wind direction) until an all-clear was given.

#### 1.1.2.1 Location

CITGO (East) is located at 1802 Nueces Bay Blvd, Corpus Christi, Texas, 78469-0321.

#### 1.1.2.2 Description of Threat

The release of HF and hydrocarbons with the potential for offsite impact. A number of residential communities surround the site.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Upon arrival, OSC Enders obtained additional information of materials released/discharged, emergency response actions taken and determined if additional EPA emergency response actions were necessary.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

OSC Enders met with CITGO, TCEQ and the local LEPC on March 8, 2012 to verify the facts of the release, response actions and notification procedures. CITGO reported an HF amount of 90 lbs and less than 2000 lbs of hydrocarbons. The RQ limit for HF is 100 lbs. Offsite air monitoring was done by TCEQ at Hillcrest, Dona Park, Oak Park, Navigation and Upriver Road and the upwind neighborhoods. CITGO addressed the downwind neighborhoods to include Elementis, Calpine and Buddy Lawrence road. No offsite detections were made with monitoring equipment. CITGO did not make an NRC notification as they believed the material released was under the RQ limit. The group also met with the CSB about the ongoing investigation. The CSB was in the process of examining the flange to calculate the amount of material released. The CSB report will confirm whether the RQ for HF was exceeded. An ETA for the CSB report was not given at the meeting.

#### 2.1.2 Response Actions to Date

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

### 2.2 Planning Section

#### 2.2.1 Anticipated Activities

CSB Investigation and follow-up with CITGO, local and state agencies

##### 2.2.1.1 Planned Response Activities

##### 2.2.1.2 Next Steps

Follow-up with the CSB for the preliminary report to verify if the amount of HF released was above the RQ limit

### **2.2.2 Issues**

A few issues were identified with Nixle and the notification system;

- 1) how to address a portion of the community that is transient. The LEPC made a total of 348 calls for the incident and 104 came back as operator errors, disconnects or other.
- 2) CITGO needs to improve the time from when an internal alarm sounds and the Nixle message is sent
- 3) message content needs to be clear and understandable to the public
- 4) as part of the LEPC, industry partners have created their own standard messages to save time during an event. Police and Fire officials can use the standard messages, but are not required to. Sometimes there is a disconnect between the standard facility language and Police/Fire.
- 5) each facility has different internal warning sirens which could be confusing to residents without proper training and/or documentation to identify. Facilities say they cannot have the same sirens because if one industry sounds the alarm for a Level 3 incident and it is heard at another near by facility they may think their own facility is the one experiencing the event.
- 6) for a resident to receive a message from Nixle they have to self initiate to sign up via their cell phones or the internet
- 7) the LEPC has found that several older residents do not text so at the present they are researching a new product that can resolve this issue
- 8) some cell phone carriers disable access to short codes and the person will need to contact their carrier to enable the phone to send and receive messages from short codes

Although a few improvements need to be made to the notification system, it was agreed upon by the response community that Nixle worked as it should during the incident. The LEPC has plans to get a new system by the end of the year that will have text, email, reverse 911 and voice to cell phone options. Nixle will then become the backup system. The LEPC is planning a door to door event for the neighborhoods of Hillcrest, Dona Park, Solar Estates, Douglas Estates and Academy Height to inquire if residents would like to be notified by Nixle, landline or email. At this time they can also address any problems residents might be experiencing with access to the notification systems. The Hillcrest event is scheduled to begin in March 31, 2012 and Dona Park is scheduled for April 2, 2012. The LEPC has a number of notification options in place other than Nixle including;

- information line 361-826-4636 with message (Notification Tool)
- reverse 911 / GeoCast to call Hillcrest (Any area in Nueces County and Corpus Christi)
- ads in newspapers, movie theaters, on buses (Awareness)
- highway signs (Notification Tool)
- NOAA radios (Notification Tool)
- EAS system (only for Level 3 events) (Notification Tool)
- Nixle Email or Text (Notification Tool)
- KLUX 89.5 FM(Notification Tool)

### **2.3 Logistics Section**

No information available at this time.

### **2.4 Finance Section**

No information available at this time.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

### **3.1 Unified Command**

### **3.2 Cooperating Agencies**

TCEQ, Corpus Christi Fire Department/LEPC, Chemical Safety Board (CSB), US EPA

## **4. Personnel On Site**

No information available at this time.

## **5. Definition of Terms**

### **Elementis Chromium**

3800 Buddy Lawrence Drive  
Corpus Christi, TX 78407

### **Calpine Electric**

3850 Buddy Lawrence Dr  
Corpus Christi, Tx 78407

### **Nixle**

an authenticated and secure service that connects municipal agencies and community organizations to their residents in real-time. [www.nixle.com](http://www.nixle.com)

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.